



Walden Asset Management

*Advancing sustainable business practices since 1975*

August 5, 2015

Mr. Ian Read  
Chief Executive Officer  
Pfizer, Inc.  
235 E 42<sup>nd</sup> Street  
New York, NY 10017

Dear Mr. Read:

As investors and organizations concerned about climate change representing over \$324 billion in assets under management, we write to address what we believe is a misalignment between **Pfizer** leadership addressing climate change and your role as a member of the Board of Directors of the U.S. Chamber of Commerce (the Chamber).

We commend **Pfizer** for addressing the economic and environmental challenges associated with climate change. The company has pursued a number of actions demonstrating its commitment to sustainability and responsible corporate citizenship including climate change. In contrast, we believe the Chamber is obstructing progress on climate change as it speaks out and lobbies aggressively against reasonable and flexible policy solutions. As a member of the Board of the Chamber, **Pfizer** has a special responsibility to carefully review the Chamber's climate policies, programs and advocacy.

Shareholders have previously raised concerns with the business community about climate lobbying and the misalignment between trade association positions and of its many members. We urge you to evaluate how trade associations such as the Chamber utilize your company's funds in their lobbying and advocacy on climate policy, potentially exposing the company to significant reputational risk.

Without question, public and investor scrutiny of corporate lobbying on climate policy is escalating. CDP provides the world's largest public repository of corporate responses to climate change. Supported by global investors with over \$95 trillion in assets under management, CDP asks detailed questions about corporate engagement on climate policy, including how companies directly and through third parties work to influence climate policies.

Additionally, the Principles for Responsible Investment (PRI), a global investor network of approximately 1,350 signatories with over \$59 trillion in assets under management, has established an investor working group focusing on corporate climate lobbying. This working group is specifically addressing company positions on public policies needed to mitigate and adapt to climate change and protect our global economy.

Numerous companies have also received shareholder resolutions seeking disclosure on corporate lobbying in recent years, including lobbying on climate change. Many of these companies have engaged with investors and other stakeholders in a meaningful way. They have reviewed their corporate climate policies and lobbying practices, updated them as necessary, and disclosed them publicly. They have also communicated with trade associations where they are members, and encouraged them to amend their policies and programs on climate.

Regarding the U.S. Chamber of Commerce specifically, its history addressing climate change goes back a number of years. In March 2010, the Chamber petitioned the U.S. Environmental Protection Agency (EPA), challenging the Agency's findings that greenhouse gases endanger human health and welfare (the foundation for regulation). The EPA ruled against the Chamber's petition stating that climate science was sound and the International Panel on Climate Change ("IPCC") Fourth Assessment Report demonstrated that "climate science is credible, compelling and growing stronger." As a result of the Chamber's aggressive stance against the EPA's authority to regulate greenhouse gases, a regulatory power subsequently upheld by the U.S. Supreme Court, some companies changed their relationship with the Chamber or spoke out publicly in opposition to its position on climate change.

The U.S. government has recently expanded commitments to address climate change through ambitious but achievable targets to reduce greenhouse gas emissions.<sup>1</sup> We hope to see the business community support these commonsense solutions currently underway.

The Clean Power Plan, the cornerstone of President Obama's climate strategy, will address the single largest source of carbon pollution in the U.S. and will have major implications for any global climate agreement reached at the 2015 United Nations Climate Change Conference in Paris at the end of the year.

- Power plants are the largest single source of carbon pollution in the U.S. The proposed Clean Power Plan goal is a 32 percent reduction in carbon pollution from the power sector by 2030 (relative to 2005). The Plan will also reduce pollutants that contribute to soot and smog e.g. sulphur dioxide by 90% and nitrogen oxide by 72%.

---

<sup>1</sup> In November 2014, in an historic joint announcement with China, President Obama laid out a goal to reduce greenhouse gas emissions by 26 to 28 percent below 2005 levels by 2025. China also announced its intent to peak carbon emissions around 2030 and to double its share of zero carbon energy to 20 percent. The announcement was a pivotal step for climate action and for the U.S. China relationship, as the world's two largest economies, energy consumers and carbon emitters came together to demonstrate leadership on an issue that affects the entire world.

In order for the U.S. to meet this goal, President Obama has developed a Climate Action Plan, which includes the following:

- Reducing Carbon Pollution from new and existing power plants;
- "Accelerating clean energy leadership:" the deployment of clean energy technology; and
- "Building a 21<sup>st</sup> century clean energy infrastructure:" stronger fuel economy standards for passenger and heavy duty vehicles.

- The EPA estimates the Clean Power Plan, which addresses new and existing power plants, will lead to public health and climate benefits worth an estimated \$54 billion in 2030. This includes avoiding 3,600 premature deaths and 90,000 asthma attacks in children.<sup>2</sup>
- The EPA's analysis also shows that there will be enough capacity across the U.S. electricity system to meet the anticipated level of demand. Coal, oil and natural gas will continue to have an important role in a diverse U.S. energy mix for years to come, with coal and natural gas remaining the two leading sources of electricity generation.

The EPA finalized the Clean Power Plan August 3, 2015. The Chamber and the National Association of Manufacturers (NAM) have indicated that they plan to sue to block these regulations. In addition, the Chamber already is actively challenging EPA plans and supporting states that are also suing the EPA. We believe this activity will embroil Board members and companies that are Chamber members in a highly visible political controversy on climate change.

Mr. Tom Donohue, Chief Executive Officer of the Chamber, states that he speaks for the business community and Chamber members on key issues such as climate change, healthcare reform and financial reform. He also asserts that the Chamber is representing and protecting the interests of business on these critical issues as it pursues legal action, lobbies on public policy, and takes positions in Congressional contests.

We believe that **Pfizer** supports strong and effective climate policies that may conflict with the positions and actions taken by the Chamber, such as suing the EPA. This poses a dilemma for shareholders and other stakeholders who receive mixed messages.

We urge **Pfizer** to consider taking steps to distance itself from the Chamber's advocacy on climate change. Please consider the following:

1. Compare your position on climate to the Chamber's and, as appropriate, issue a public statement clarifying that the Chamber does not represent your views or positions.
2. Privately state your company's position on climate change to senior Chamber management and ask them to refrain from suing the EPA and challenging the EPA's new Clean Power Plan rules.

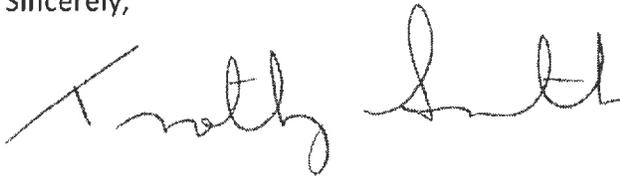
---

<sup>2</sup> <https://www.whitehouse.gov/climate-change?thanks=1&side=74825221#section-cutting-carbon-pollution>; and <http://www2.epa.gov/carbon-pollution-standards/fact-sheet-clean-power-plan-benefits>; and August 3, 2015, President Obama to announce historic carbon pollution standards, White House Fact Sheet.

3. Request that the Chamber report publicly on how it is using member dues and funds to influence climate change legislation and regulation.
4. Along with like-minded Chamber Board members, collaborate to urge the Chamber to accurately reflect its members' views and take a more balanced position on climate change initiatives.

We hope that you will give thorough consideration to our request. We look forward to hearing from you to discuss these and other potential actions you may take to ensure a consistent public policy position on climate change. Please respond to Timothy Smith (617-726-7155 or [tsmith@bostontrust.com](mailto:tsmith@bostontrust.com)), who will act as point person and share your response with the signatories below.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy Smith". The signature is fluid and cursive, with the first name "Timothy" written in a larger, more prominent script than the last name "Smith".

Timothy Smith  
Senior Vice President  
Director of ESG Shareowner Engagement  
Walden Asset Management  
One Beacon Street  
Boston, MA 02108

Cc: Mr. Stephen Sanger – Chair, Corporate Governance Committee  
Ms. Margaret M. Madden – Corporate Secretary

Signatories who are Investment Firms, Mutual Funds, Financial Advisors and Pension Funds -

Patrick Doherty  
Director of Corporate Governance  
New York State Comptroller  
State of New York Pension Funds  
59 Maiden Lane, 30<sup>th</sup> floor  
New York, NY 10038

Denise L. Nappier  
Treasurer State of Connecticut  
Hartford, CT

G. Benjamin Bingham  
Chief Executive Officer  
3Sisters Sustainable Management, LLC  
1700 Sansom Street, 12<sup>th</sup> Floor  
Philadelphia, PA 19103

Brian Minns  
Manager, Sustainable Investing  
Addenda Capital Inc.  
1050-36 Toronto Street  
Toronto, ON, M5C 2C5 Canada

Natasha Lamb  
Director of Research & Shareholder  
Engagement  
Arjuna Capital  
204 Spring Street  
Marion, MA

Andrew Behar  
Chief Executive Officer  
As You Sow  
1611 Telegraph Ave., Ste. 1450  
Oakland, CA 94612

Abigail Herron  
Head of Responsible Investment  
Engagement  
Aviva Investors  
1 Poultry  
London, United Kingdom

Lisa Renstrom & Bob Perkwotiz  
Trustees  
Bonwood Social Investments  
2154 Wyoming Ave. NW  
Washington, DC 20008

John Streur  
Chief Executive Officer  
Calvert Investments  
4550 Montgomery Avenue  
Bethesda, MD 20814

Shelley Alpern  
Director of Social Research & Advocacy  
Clean Yield Asset Management  
16 Beaver Meadow Road  
Norwich, VT 05055

Duane Roberts  
Director of Equities  
Dana Investment Advisors  
15800 West Bluemound Rd, Suite 250  
Brookfield, WI 53005

Adam Kanzer  
Managing Director  
Domini Social Investments LLC  
532 Broadway, 9<sup>th</sup> floor  
New York, NY 10012

Mark A. Regier  
Vice President of Stewardship Investing  
Everence Financial & Praxis Mutual Funds  
1110 North Main Street  
Goshen, IN 46527

Steven J. Schueth  
President  
First Affirmative Financial Network, LLC  
2503 Walnut Street, Suite 201  
Boulder, CO 80302

Eric A. Smith  
Founder, Director of Strategy & Advisory  
Services  
Goodfunds Wealth Management branch of  
KMS Financial Services, Inc.  
240 2<sup>nd</sup> Avenue, Suite 200  
Seattle, WA 98104

Shane Yonston  
Principal Advisor  
Impact Investors  
235 Montgomery Street, Suite 1050  
San Francisco, CA 94104

Jay Youngdahl  
Chair, Board of Trustees  
Middletown Works Retiree Health Care  
Fund  
Middleton, OH

Luan Steinhilber  
Director of Shareholder Advocacy  
Miller / Howard Investments, Inc.  
324 Upper Byrdcliffe Road  
Woodstock, NY 12498

Michelle de Cordova  
Director, Corporate Engagement and Public  
Policy  
NEI Investments  
1111 West Georgia Street, Suite 505  
Vancouver, BC, Canada

Julie N.W. Goodridge  
Chief Executive Officer  
NorthStar Asset Management, Inc.  
2 Harris Avenue  
Jamaica Plain, MA 02130

Julie Fox Gorte, Ph.D.  
Senior Vice President for Sustainable  
Investing  
Pax World Management LLC  
30 Penhallow Street, Suite 400  
Portsmouth, NH 03801

Danielle Ginach  
Impact Manager  
Sonnen Capital  
50 Osgood Place, Suite 320  
San Francisco, CA 94133

Andrew Bellak  
Chief Executive Officer  
Stakeholders Capital  
321 Main Street  
Amherst, MA 01001

Jonas D. Kron  
Senior Vice President  
Director of Shareholder Advocacy  
Trillium Asset Management, LLC  
Two Financial Center  
60 South Street, Suite 1100  
Boston, MA 02111

Steven Heim  
Managing Director  
Boston Common Asset Management  
84 State Street, Suite 940  
Boston, MA 02109

Kirsty Jenkinson  
Managing Director and Sustainable  
Investment Strategist  
Wespath Investment Management, General  
Board of Pension & Health Benefits  
United Methodist Church  
1901 Chestnut Avenue  
Glenview, IL 60025-1604

George R. Wilbanks  
Managing Partner  
Wilbanks Partners LLC  
One Stamford Plaza, 9<sup>th</sup> floor  
263 Tresser Boulevard  
Stamford, CT 06901

Sonia Kowal  
President  
Zevin Asset Management LLC  
11 Beacon Street, Suite 1125  
Boston, MA 02108

#### Religious Investor Signatories

Andrew Brown  
Chief Executive Officer  
The Church Commissioners for England  
Church House, Great Smith Street  
London SW1P 3AZ

Kathryn McCloskey  
Director, Social Responsibility  
United Church Funds  
475 Riverside Drive, Suite 1020  
New York NY 10115

Tim Brennan  
Treasurer & CFO  
Unitarian Universalist Association  
24 Farnsworth Street  
Boston, MA 02210-1409

Jeffery W. Perkins  
Executive Director  
Friends Fiduciary Corporation  
1650 Arch Street, Suite 1904  
Philadelphia, PA 19103

Barbara Jennings, CSJ  
Coordinator  
Midwest Coalition for Responsible  
Investment  
6400 Minnesota Ave.  
St. Louis, MO 63111 2807

Rev. Michael H. Crosby, OFM Cap.  
Corporate Responsibility Office  
Province of St. Joseph of the Capuchin  
Order Milwaukee, WI and  
Executive Director,  
Wisconsin/Iowa/Minnesota Coalition for  
Responsible Investing

Sr. Judy Byron, OP  
Director  
Intercommunity Peace & Justice  
Center Northwest Coalition for Responsible  
Investment  
1216 NE 65th St  
Seattle, WA 98115

Frank Rauscher  
Senior Principal  
Aquinas Associates  
8117 Preston Road, West Tower Suite 300  
Dallas, TX 75225

Susan Vickers  
Dignity Health  
185 Berry Street, Suite 300  
San Francisco, CA 94107

Tom McCaney  
Associate Director, Corporate Social  
Responsibility  
Sisters of St Francis of Philadelphia  
609 S. Convent Road  
Aston, PA 19014

Jo Marie Chrosniak, HM  
Coordinator  
Region VI Coalition for Responsible  
Investment  
20015 Detroit Rd.  
Cleveland, OH 44116

Ruth Geraets, PBVM  
Congregational Treasurer  
Sisters of the Presentation of the BVM  
1500 N. 2<sup>nd</sup> Street  
Aberdeen SD 57401-1238

Mary Beth Gallagher  
Acting Director  
Tri-State Coalition for Responsible  
Investment  
40 South Fullerton Ave.  
Montclair, NJ 07042

Mary Ellen Gondeck  
Member of Justice Team  
The Congregation of St. Joseph  
3427 Gull Rd.  
Nazareth, MI 49074

Sister Louise Gallahue, D.C.  
Provincial  
Daughters of Charity, Province of St Louise  
St. Louis, MO

Lura Mack  
Director  
Portfolio Advisory Board  
Adrian Dominican Sisters  
Adrian, MI

Tonya Wells  
Vice President, Public Policy & Federal  
Advocacy  
Trinity Health  
Newtown Square PA and Livonia MI

Susan Makos  
VP of Social Responsibility  
Mercy Investment Services  
St. Louis, MO

Richard E. Walters,  
Director of Corporate Social Responsibility  
The Pension Boards – UCC, Inc.  
475 Riverside Drive  
New York, NY

Foundations and Non-Governmental Organizations Signers -

Ellen Friedman  
Executive Director  
Compton Foundation  
101 Montgomery Street, Suite 850  
San Francisco, CA 94104

Victor De Luca  
Jessie Smith Noyes Foundation  
122 East 42<sup>nd</sup> Street, Suite 2501  
New York, NY 10168

Elizabeth Storer  
President and Chief Executive Officer  
George B. Storer Foundation  
P. O. Box 8159  
Jackson, WY 83001

Katie Briggs  
Managing Director  
and Tamsin Taylor, Finance Committee  
Laird Norton Family Foundation  
801 2<sup>nd</sup> Avenue, Suite 1300  
Seattle, WA 98104

Charlotte Levinson  
President  
The Max & Anna Levinson Foundation  
P. O. Box 6309  
Santa Fee, NM 87502

Jenny Russell  
Executive Director  
Merck Family Fund  
P. O. Box 870245  
Milton Village, MA 02187

Frank Sanchez  
Executive Director  
The Needmor Fund  
42 South St. Clair Street  
Toledo, OH 43604

Raymond Offenheiser  
President  
Oxfam America  
226 Causeway Street, 5<sup>th</sup> floor  
Boston, MA 02114

Tim Little  
Executive Director  
Rose Foundation for Communities and the  
Environment  
1970 Broadway, Suite 600  
Oakland, CA 94612

Virginia W. Quick  
Chief Financial Officer  
The Sierra Club Foundation  
85 Second Street, Suite 750  
San Francisco, CA 94105

John F. Swift  
President  
Swift Foundation  
308 Coates Drive  
Aptos, CA 95003

Ellen Dorsey  
Executive Director  
Wallace Global Fund  
1990 M Street, NW, Suite 250  
Washington, DC 20036

Kelly Clark  
Director  
Tellus Mater Foundation  
61 Grosvenor Street  
London W1K 3JE, United Kingdom

Ken Kimmell  
President  
Union of Concerned Scientists  
2 Brattle Square  
Cambridge, MA 02138

Judith A. Hill  
Chief Financial Officer  
Tides, Inc.  
1014 Torney Avenue  
San Francisco, CA 94129